

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

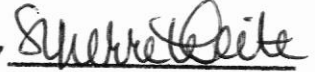
IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

APR - 5 2022

UNITED STATES OF AMERICA

§  
§  
§  
§  
§

BY  
DEPUTY



v.

No. 1:23-CR-4

RAHIM ABDAR JABBAR III

**FACTUAL BASIS**

The government presents to the Court, by and through the undersigned Assistant United States Attorney in and for the Eastern District of Texas, joined by the defendant, **Rahim Abdar Jabbar III**, and the defendant's attorney **Gary Bonneaux** and presents this factual basis in support of the defendant's plea of guilty to Count One of the Indictment and in support thereof, would show the following:

1. That the defendant **Rahim Abdar Jabbar III**, hereby stipulates and agrees to the truth of all matters set forth in this factual basis, and agrees that such admission may be used by the Court in support of his plea of guilty to Count One of the Indictment, which charges a violation of 18 U.S.C. §922(g)(1), possession of a firearm by a prohibited person.
2. That the defendant, **Rahim Abdar Jabbar III**, who is pleading guilty to such indictment, is one and the same person charged in the indictment.
3. That the events described in the indictment occurred in the Eastern District of Texas and elsewhere.
4. That had this matter proceeded to trial, the government, through the testimony of witnesses, including expert witnesses, and through admissible exhibits, would have

proven, beyond a reasonable doubt, each and every essential element of the offense alleged in the indictment; specifically, the government would have proven the following stipulated facts:

- a. On October 20, 2022, an officer with the Beaumont Police Department stopped the defendant, **Rahim Abdar Jabbar III**, who was operating a bicycle in violation of the Texas Transportation Code.
- b. **Jabbar** admitted to the officer that there would be a firearm in the bag he was carrying.
- c. A search of the bag produced one Canik, semi-automatic pistol, model METE SFT, 9 mm, serial number 21 CC 24482.
- d. A check of the defendant's criminal history revealed he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year.
- e. The defendant, did knowingly and unlawfully possess in and affecting interstate or foreign commerce, a firearm, to wit, one Canik, semi-automatic pistol, model METE SFT, 9 mm, serial number 21 CC 24482, while knowing that he had been convicted of the aforementioned crime.
- f. Prior to knowingly possessing the firearm on October 20, 2022, **Jabbar** knew he was a previously convicted felon with the following felony conviction:

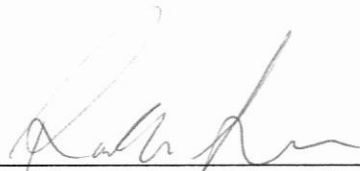
Assault Public Servant in the 21st District Court of Lee County, Texas in cause number 8331 on June 28, 2016.

- g. A special agent with the Bureau of Alcohol, Tobacco, and Firearms analyzed the firearm listed above and determined that the firearm was manufactured outside the state of Texas, and therefore traveled in interstate or foreign commerce.
- h. **Rahim Abdar Jabbar III** committed the offense in the Eastern District of Texas.

DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

5. I have read this factual basis and the indictment or have had them read to me and have discussed them with my attorney. I fully understand the contents of this factual basis and agree without reservation that it accurately describes the events and my acts.

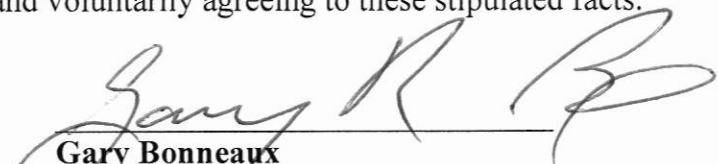
Dated: 3/14/23

  
**Rahim Abdar Jabbar III**  
Defendant

DEFENSE COUNSEL'S SIGNATURE AND ACKNOWLEDGMENT

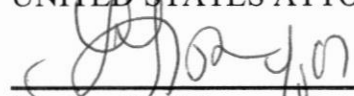
6. I have read this factual basis and the indictment and have reviewed them with my client, **Rahim Abdar Jabbar III** based upon my discussions with the defendant, I am satisfied that the defendant understands the factual basis as well as the indictment, and is knowingly and voluntarily agreeing to these stipulated facts.

Dated: March 14, 2023

  
**Gary Bonneaux**  
Attorney for the Defendant

Respectfully submitted,

BRIT FEATHERSTON  
UNITED STATES ATTORNEY



Tommy L. Coleman by *Lauren Guston*  
Special Assistant United States Attorney

Eastern District of Texas

Texas Bar No: 24034383

550 Fannin St. Suite 1250

Beaumont, Texas 77701

Telephone: (409) 839-2538

Facsimile: (409) 839-2550

Email: [tommy.coleman@usdoj.gov](mailto:tommy.coleman@usdoj.gov)